

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WILLIAM CARINI,

Plaintiff,

v.

JAMES GENTILCORE,

Defendant.

No. 1:17-cv-8687

Judge Sarah L. Ellis

Magistrate Judge Jeffrey Cole

**DEFENDANT'S UNOPPOSED MOTION TO  
EXTEND DISCOVERY DEADLINES**

Defendant, James Gentilcore, by and through his attorney, Lisa Madigan, Attorney General of the State of Illinois, and for his motion to extend discovery deadlines, states the following:

1. On February 13, 2018, this Court entered an order setting the due date for final MIDP supplementation for August 24, 2018, and setting the close of fact discovery for September 21, 2018. (Dkt. 15.)

2. On August 13, 2018, this matter was reassigned to the undersigned attorney, who subsequently entered her appearance on behalf of Defendant James Gentilcore on August 15, 2018. (Dkt. 25.) That same day, Mr. Brian Kolp was withdrawn as counsel for Defendant Gentilcore. (Dkt. 26.)

3. Defendant's counsel anticipates that a second attorney will be assigned to this case in the beginning of September following her start of employment at the Office of the Illinois Attorney General.

4. The undersigned attorney needs additional time to investigate this matter and familiarize herself with the file and therefore requests that the deadline for final MIDP supplementation be extended up to and including September 7, 2018.

5. Defense counsel also anticipates that additional time will be needed to complete fact discovery in this matter given her recent involvement in the case and the anticipated start date of co-counsel and accordingly requests that the close of fact discovery be extended up to and including November 30, 2018.

6. Defense counsel has spoken with Mr. Karl Leonard, attorney for Plaintiff, about extending the deadline for final MIDP supplementation and extending the close of fact discovery to November 30, 2018. Plaintiff's counsel had no objections and does not oppose this motion.

7. This motion is not filed in bad faith, for purposes of undue delay, or for any other improper purpose. This motion is the first request for an extension of discovery deadlines.

**WHEREFORE**, Defendant respectfully requests that this Honorable Court enter an order extending the deadline for final supplementation of MIDP to September 7, 2018, and extending the close of fact discovery to November 30, 2018.

LISA MADIGAN  
Attorney General of Illinois

Respectfully submitted,

s/ Erin Walsh  
ERIN WALSH  
Assistant Attorney General  
General Law Bureau  
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*Attorney for Defendant James Gentilcore*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 24, 2018, she electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ *Erin Walsh*